

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF
MASSACHUSETTS

CASE NO. CR 04-10220 JLA

UNITED STATES OF AMERICA

vs.

YVELISSE A. GONZALEZ RODRIGUEZ

MOTION TO EXTEND TIME FOR FILING OF MOTION TO SUPPRESS

NOW comes the defendant in the above-entitled matter, by and through undersigned counsel, and respectfully moves this Honorable Court for an extension of time for filing her Motion to Suppress.


In support hereof undersigned counsel says:

1. Undersigned counsel has been on continuous trials for the past several weeks, and thus, has not had sufficient time to prepare the Motion to Suppress in the instant case.
2. Undersigned counsel has spoken with AUSA Maureen Hogan, who has likewise been subject to a very busy schedule. Subject to this Honorable Court's approval, the parties have agreed to extend the time for both the filing of the motion and the government's response thereto until November 30, 2004 for the filing of said motion and to December 4, 2004 for the government's response.
3. It is further agreed that the period of time embraced in any such extension be excluded from the speedy trial calculation.

4. The present motion is not for the purpose of delay, is without any fault on the part of the defendant and is in the interest of justice.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY.

Respectfully submitted,
YVELISSE A. GONZALEZ RODRIGUEZ
By her attorney,


RONALD IAN SEGAL
23 Central Avenue
Suite 605
Lynn, MA 01901
(781) 599-2800

CERTIFICATE OF SERVICE

I, Ronald Ian Segal, Esquire, hereby certify that I have delivered copies of the within Motion To Extend Time For Filing Of Motion To Supress by FAXING same, to Assistant United States Attorney Maureen Hogan, One Courthouse Way, Suite 9200, Boston, Massachusetts 02210, this 9th day of November, 2004.


RONALD IAN SEGAL